

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

SHARON BOST, in her individual capacity  
and as Personal Representative of the  
ESTATE OF FATIMA NEAL,

Plaintiff,

v.

WEXFORD HEALTH SOURCES, INC., *et*  
*al.*,

Defendants.

Case No. 1:15-cv-03278-ELH

Hon. Ellen L Hollander,  
District Judge

JURY TRIAL DEMANDED

*Approved*  
*ELH*  
*USDG*  
*7/6/20*

\* \* \* \* \*

**STATUS REPORT**

The Parties, through their undersigned counsel, respectfully submit the following report on the status of ESI discovery in this case:

1. Since their last status report, Dkt. 492, and throughout the COVID-19 shutdown/slowdown, the parties have continued to work cooperatively on ESI related discovery. During that time, Wexford's counsel completed the review of approximately 31 GB of data and produced approximately 6500 pages of documents as part of the first portion of ESI discovery.

2. Since the initial ESI production, the parties have continued to confer about the remaining portion of ESI discovery, including searching email accounts of numerous Wexford employees. The initial volume of email data was over 60GB and included over 600,000 documents and files. Given the initial volume of data, the parties negotiated and reached an agreement on the search parameters and the number of documents to be included in the email review. The pertinent files and documents have now been retrieved from Wexford's servers, the search terms run, and Wexford's ESI vendor is currently in the process of uploading 13,669 documents/files for review.

Wexford's counsel anticipates they can complete the review and produce responsive documents or files by late July or early August.

3. After review and production of the remaining ESI information, the parties will resume depositions and believe they will be able to complete depositions and conclude fact-discovery in approximately 75 days. However, the parties recognize that the depositions of some of the remaining fact witnesses could be delayed or complicated by COVID-19 as some of the witnesses reside in Florida and Arizona.

4. The Parties will participate in a settlement conference with Judge Coulson on October 14, 2020.

5. Given the status of discovery, the Parties request that the fact discovery deadline be set for October 30, 2020. On or before October 30, 2020 the parties will file a joint status report on fact discovery and provide the Court with suggested deadlines for expert discovery and dispositive motions.

RESPECTFULLY SUBMITTED,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6<sup>th</sup> day of July, 2020 a copy of the foregoing Status Report was electronically filed and served upon and/or mailed to:

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